

I am greatly concerned about the interference BPL will cause to licensed users of the high frequency (h.f.) and very high frequency (vhf) portion of the spectrum. Studies and measurements in Europe and Japan have shown that BPL will cause massive interference to their licensed users. Japan has rejected BPL as unworkable due to this interference.

Modeling and measured data of BPL by the ARRL shows that the system increased the noise floor thus rendering all but the strongest signals inaudible. This would have the effect of rendering the only part of the electromagnetic spectrum that allows ionospheric propagation, useless. There are nearly one million users of this part of the spectrum, in the United States, that will lose their capability to communicate if this system is deployed. This would be caused by an unlicensed service that is attempting to provide a network which already exists using cable modems and the telephone system.

The NTIA is also seriously concerned that their Government, police, fire, etc. licensed users will be severely impacted. They are presently conducting modeling of this problem and have asked the FCC to delay any action until the end of the year.

A review of the comments submitted by others show an overwhelming bias against the deployment of BPL. I therefore strongly suggest that the FCC not approve this system.